

REMARKS

Claims 1, 2, 4-9, 11-13, 15-20 and 22-26 are pending in the present application. By this response, claims 1, 4, 5, 7, 8, 11-13, 15, 16, 19, 22, 23 and 24 are amended and claims 3, 10, 14 and 21 are canceled. Claims 1, 12 and 23 are amended to recite "generating a magnified display of the first document in memory at the client, mapping the magnified display to a display space of the first document, and displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document." Support for these amendments may be found at least on page 10, lines 23-29 of the current specification. Claims 1, 12 and 23 are further amended to incorporate subject matter similar to canceled claims 3 and 14. Claims 8, 19 and 23 are amended to incorporate subject matter similar to canceled claims 10 and 21. Reconsideration of the claims in view of the above amendments and the following remarks is respectfully requested.

I. Examiner Interview

Applicants thank Examiner Nguyen and Examiner Bashore for the courtesies extended to Applicants' representative during the October 18, 2004 telephone interview. During the interview, the differences of the applied references to that of the presently claimed invention were discussed. Examiner Nguyen and Examiner Bashore indicated that they would consider the amendments. Additionally, Applicants respectfully submit that the current amended claims have been amended further since the Examiner interview. The substance of the interview is summarized in the remarks of sections that follow.

II. 35 U.S.C. § 102, Alleged Anticipation, Claims 1-4, 8-15 and 19-26

The Office Action rejects claims 1-4, 8-15 and 19-26 under 35 U.S.C. § 102(e) as being allegedly anticipated by Guedalia (U.S. Patent No. 6,121,970). This rejection is respectfully traversed.

As to independent claims 1, 12 and 23, the Office Action states:

As to independent claim 1, Guedalia teaches method for magnifying a portion of a document in a browser (*Abstract*), comprising:

- presenting a first document in a first display in the browser (*receiving by the client computer from the server an HTML page; Abstract/col.4, lines 29-41/col.5, lines 52-53/col.8, lines 51-52*);
- presenting a magnified portion of the first document in a second display in the browser (*the second image being an enlarged portion of the first image, and the enlarged portion of the first image corresponding to the selected location, and sending by the server computer to the client computer the new HTML page; Abstract / col.13, lines 60-67 and col.17, lines 56-61*);
- receiving a request for an action within the second display; and performing the action with respect to the first document (*selecting by the user, using a pointing device, a location within the view window corresponding to one of the plurality of sub-regions, sending by the client computer to the server an indication of the sub-region selected by the user, modifying by the server computer the HTML page to generate a new HTML page with a link to a second image ... sending by the server computer to the client computer the new HTML page; Abstract and col.17, lines 40-63*).

Office Action dated July 28, 2004, pages 2-3.

Claim 1, which is representative of the other rejected independent claims 12 and 23 with respect to similarly recited subject matter, reads as follows:

1. A method for magnifying a portion of a document in a browser, comprising:
 - presenting a first document in a first display in the browser on a client;
 - generating a magnified display of the first document in memory at the client;
 - displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document;
 - mapping the selected portion of the magnified display to a display space of the selected portion of the first document; and
 - responsive to receiving a request for an action within the second display, performing the action with respect to the first document.

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. In re Bond, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when

determining patentability. In re Lowry, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. Kalman v. Kimberly-Clark Corp., 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983). Applicants respectfully submit that Guedalia does not identically show each and every feature of the claims arranged as they are in the claims. Specifically, Gedalia does not teach generating a magnified display of the first document in memory at the client; mapping the selected portion of the magnified display to a display space of the selected portion of the first document, and responsive to receiving a request for an action within the second display, performing the action with respect to the first document.

Guedalia is directed to archiving digital data on a server computer, and enabling a user, by means of a client computer, to interactively view a digital image derived from the digital data, including receiving by the client computer from the server computer an HTML page, the HTML page including a view window where a first image is displayed, the view window being partitioned into a plurality of imaginary sub-regions at least one of which contains a multiplicity of pixels, selecting by the user, using a pointing device, a location within the view window corresponding to one of the plurality of sub-regions, sending by the client computer to the server computer an indication of the sub-region selected by the user, modifying by the server computer the HTML page to generate a new HTML page with a link to a second image, the second image being an enlarged portion of the first image, and the enlarged portion of the first image corresponding to the selected location, and sending by the server computer to the client computer the new HTML page.

Guedalia does not teach generating a magnified display of the first document in memory at the client. The Office Action alleges that Guedalia teaches presenting a magnified portion of the first document in a second display in the browser at column 13, lines 60-67 and column 17, lines 56-61, which read as follows:

FIG. 2 illustrates an example of zooming in. The user positions a mouse pointer 46 at a position within the view window, and clicks on the mouse. This issues a request to zoom in on the portion of the image where the mouse pointer is located. In a preferred embodiment, the present invention operates by identifying a specific image portion, associated with the sub-region containing the mouse pointer 46, to be magnified.

(Column 13, lines 60-67)

modifying, by said server computer using server-side software, the HTML page to generate a new HTML page with a link to a second image, the second image being an enlarged portion of the first image, and the enlarged portion of the first image corresponding to the selected location; and

(Column 17, lines 56-61)

In both of these sections, Guedalia describes the selection of a sub-region by a user which in turn initiates a request to a server to retrieve the specified sub-region from the server and the server returns the enlarged image to the display. There is nothing in these sections, or any other section of Guedalia, that teaches generating a magnified display of the first document in memory at the client. Guedalia merely retrieves the selected sub-region image with an associated magnified image. In column 14, lines 1-12, Guedalia teaches that a user selects a sub-region by clicking at a location in the view window. In turn, each of these sub-regions is used to trigger the server to embed an appropriate image portion in the server's response. Thus, Guedalia merely retrieves a pre-existing image and does not generating a magnified display of the first document in memory at the client.

Additionally, Guedalia does not teach mapping the magnified display to a display space of the first document. Guedalia merely maps the selected sub-region selected by the user to a pre-existing image which exists on a server. The presently claimed invention maps the magnified display, which is in memory at the client, to the display space of the first document, which is on the client. Thus, the presently claimed invention performs the entire magnification process on the client.

Additionally, Guedalia does not teach responsive to receiving a request for an action within the second display, performing the action with respect to the first document. The Office Action alleges that this feature is taught in the Abstract and at column 17, lines 40-63, which read as follows:

A method for archiving digital data on a server computer, and enabling a user, by means of a client computer, to interactively view a digital image derived from the digital data, including receiving by the client computer from the server computer an HTML page, the HTML page including a view window within which a first image is displayed, the view window being partitioned into a plurality of imaginary sub-regions at least

one of which contains a multiplicity of pixels, selecting by the user, using a pointing device, a location within the view window corresponding to one of the plurality of sub-regions, sending by the client computer to the server computer an indication of the sub-region selected by the user, modifying by the server computer the HTML page to generate a new HTML page with a link to a second image, the second image being an enlarged portion of the first image, and the enlarged portion of the first image corresponding to the selected location, and sending by the server computer to the client computer the new HTML page.

(Abstract)

1. A method for archiving digit data on a server computer, and enabling a user, by means of a client computer, to interactively view a digital image derived from said digital data, comprising:

receiving by said client computer from said server computer an HTML page, said HTML page including a view window within which a first image is displayed, said view window being partitioned into a plurality of imaginary sub-regions, at least one of which contains a multiplicity of pixels;

selecting by said user, using a pointing device, a location within said view window corresponding to one of said plurality of sub-regions;

sending by said client computer to said server computer an indication of the sub-region selected by said user;

modifying, by said server computer using server-side software, the HTML page to generate a new HTML page with a link to a second image, the second image being an enlarged portion of the first image, and the enlarged portion of the first image corresponding to the selected location; and

sending by said server computer to said client computer said new HTML page.

(Column 17, lines 40-63)

In these sections, Guedalia merely describes magnifying a selected portion of a first image. More specifically, Gedalia teaches a user selecting a location within a first display corresponding to a sub-region, sending the sub-region to a server, modifying the selected portion to generate a second image, which is an enlarged portion of the first image and the server sending the second image to the client computer. The magnification process of Gedalia does not teach responsive to receiving a request for an action within the second display, performing the action with respect to the first document. In fact, Guedalia is only directed to presenting a magnified portion to the user and does not describe any actions after the presentation of the magnified portion.

Claim 8, which is representative of the other rejected independent claims 19 and 25 with regard to similarly recited subject matter, reads as follows:

8. A method for magnifying a portion of a document in a browser, comprising:
- presenting a first document in a first display in the browser;
 - receiving a selection of a portion of the first document;
 - generating a magnified display of the selected portion from the structure of the first document;
 - analyzing a document object model for the first document;
 - identifying a portion of the document object model that corresponds to the selected portion of the first document;
 - presenting the magnified display;
 - receiving a request for an action within the magnified display; and
 - performing the action with respect to the magnified display.

Applicants respectfully submit that Guedalia does not identically show each and every feature of the claims arranged as they are in the claims. Specifically, Guedalia does not teach analyzing a document object model for the first document, and identifying a portion of the document object model that corresponds to the selected portion of the first document. The Office Action alleges that these features are taught by Guedalia at column 8, lines 46-60, which reads as follows:

There is also provided in accordance with a preferred embodiment of the present invention a client viewing system for interactive viewing of a digital image by a user, the viewing being controlled by a client computer, employing digital data residing on a server computer, including a receiver for receiving by the client computer an HTML page from the server computer, the HTML page including a view window within which image data is displayed, the view window being partitioned into a plurality of sub-regions at least one of which contains a multiplicity of pixels, an input device for selecting by the user a location within the view window corresponding to one of the sub-regions, and a receiver for receiving by the client computer a new HTML page from the server, in response to the sub-region which was selected.

Nowhere in this section, or any other section of Guedalia, is a document object model for the first document analyzed and a portion of the document object model identified that corresponds to the selected portion of the first document. Guedalia merely teaches a view window that is partitioned into sub-regions and the selected sub-region is magnified and displayed in the second display. In contradistinction, the presently claimed invention analyzes a document object model for the first document. A document object model

formalizes dynamic HTML, which allows animation, interaction and dynamic updating of Web pages. The document object model provides a language and platform-neutral object model for Web pages, because it deals with the actual document structure. Guedalia is merely representing a magnified version of a previously partitioned sub-region. Guedalia is not concerned with the actual document structure.

Thus, Guedalia does not teach each and every feature of independent claims 1, 8, 12, 19, 23 and 25 as is required under 35 U.S.C. § 102. At least by virtue of their dependency on independent claims 1, 8, 12, 19, 23 and 25, the specific features of dependent claims 2, 4, 9, 11, 13, 15, 20, 22, 24 and 26 are not taught by Guedalia. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 1, 2, 4, 8, 9, 11-13, 15, 19, 20 and 22-26 under 35 U.S.C. § 102.

Furthermore, Guedalia does not teach, suggest or give any incentive to make the needed changes to reach the presently claimed invention. Absent the Examiner pointing out some teaching or incentive to implement Guedalia such that a magnified display of the first document is generated in memory at the client, the magnified display is mapped to a display space of the first document, and responsive to receiving a request for an action within the second display, an action is performed with respect to the first document, one of ordinary skill in the art would not be led to modify Guedalia to reach the present invention when the reference is examined as a whole. Absent some teaching, suggestion or incentive to modify Guedalia in this manner, the presently claimed invention can be reached only through an improper use of hindsight using the Applicants' disclosure as a template to make the necessary changes to reach the claimed invention.

Moreover, in addition to their dependency from independent claims 1, 8, 12, 19 and 25, the specific features recited in dependent claims 2, 4, 9, 11, 13, 15, 20, 22, 24 and 26 are not taught by Guedalia. For example, with regard to claims 2, 9, 13, 20, 24 and 26, Guedalia does not teach performing the action with respect to the first document wherein the action comprises a selection of a link within the magnified portion and the step of performing the action comprises retrieving and displaying a second document corresponding to the link in the first display. The Office Action alleges that this feature is taught in the Abstract and at column 17, lines 40-63, shown above. As discussed above, these sections of Guedalia merely describe magnifying a selected portion of a first

image. Guedalia does not describe any actions after the presentation of the magnified portion. Thus, Guedalia fails to teach all of the features of the presently claimed invention.

As an additional example, with regard to claims 11 and 22, Guedalia does not teach adjusting attributes of nodes in the portion of the document object model based on a magnification factor. The Office Action alleges that these features are taught by Guedalia at column 16, line 58 to column 17, line 10, which reads as follows:

Specifically, as described above, the browser sends both client state information and mouse coordinates to the server. The tokens received are the view window delimiters $x1o$, $y1o$, $x2o$, $y2o$, the pixel dimensions w , h , and the relative mouse coordinates x , y . The arrays `click__array__x1[]`, `click__array__y1[]`, `click__array__x2[]`, `click__array__y2[]` specify five sub-regions. For example, the first sub-region is the middle rectangle extending from (0.25,0.25) to (0.75,0.75), and the second sub-region is the L-shaped area in the lower left, described by the part of the rectangle extending from (0.0,0.0) to (0.5,0.5) which excludes the previous rectangle. The arrays `goto__array__x1[]`, `goto__array__y1[]`, `goto__array__x2[]` and `goto__array__y2[]` specify the image portion to be used for the response. In the example shown, the first response portion is the image portion in the middle rectangle extending from (0.25,0.25) to (0.75,0.75), and the second response portion is the image portion in the lower left rectangle extending from (0.0,0.0) to (0.5,0.5).

In this section, Guedalia merely identifies the coordinates of the selected sub-region. There is nothing in this section, or any other section of Guedalia, that teaches adjusting the attributes (contents) of the node (web page) in the portion of the document object model based on a magnification factor. Guedalia pays no concern to the contents of the web page but, rather, only magnifying the selected sub-region.

Therefore, in addition to being dependent on independent claims 1, 8, 12, 19 and 25, dependent claims 3, 4, 9-11, 14, 15, 20-22 and 26 are also distinguishable over Guedalia by virtue of the specific features recited in these claims. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 3, 4, 9-11, 14, 15, 20-22 and 26 under 35 U.S.C. § 102.

III. 35 U.S.C. § 103, Alleged Obviousness, Claims 5-7 and 16-18

The Office Action rejects claims 5-7 and 16-18 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Guedalia (U.S. Patent No. 6,121,970) in view of Aratani (U.S. Patent No. 6,266,042 B1). This rejection is respectfully traversed.

Claims 5-7 and 16-18 are dependent on independent claims 1 and 12 and, thus, these claims distinguish over Guedalia for at least the reasons noted above with regards to claims 1 and 12. Moreover, Aratani does not provide for the deficiencies of Guedalia and, thus, any alleged combination of Guedalia and Aratani would not be sufficient to reject independent claims 1 and 12 or claims 5-7 and 16-18 by virtue of their dependency. That is, Aratani does not teach receiving a request for an action within the second display and performing the action with respect to the first document, wherein the action comprises a selection of a link within the magnified portion and the step of performing the action comprises retrieving and displaying a second document corresponding to the link in the first display.

In view of the above, Guedalia and Aratani, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claims 1 and 12, from which claims 5-7 and 16-18 depend. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 5-7 and 16-18 under 35 U.S.C. § 103.

IV. Conclusion

It is respectfully urged that the subject application is patentable over the prior art of record and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

Respectfully submitted,

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